

**BEFORE THE  
UNITED STATES DEPARTMENT OF HOMELAND SECURITY  
WASHINGTON, D.C.**

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In the Matter of	)	
	)	
SECURE FLIGHT TEST PHASE	)	Docket TSA-2004-19160
	)	
	)	
<u>Notice of Emergency Clearance Request</u>	)	

**COMMENTS OF THE  
NATIONAL BUSINESS TRAVEL ASSOCIATION**

Communications with respect to this document should be addressed to:

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The National Business Travel Association (NBTA), representing over 1,500 corporate travel managers for the Fortune 1000 companies, and over 8 million international business travelers, would like to thank the Transportation Security Administration (TSA) for the opportunity to comment on the Secure Flight passenger prescreening system. Secure Flight will have a profound impact on our members, and their companies, across the country.

Prior to September 11<sup>th</sup>, 2001, business travelers were becoming an integral part of our economy. Even today, corporations are providing consistent services and support to their offices across the country and around the globe. While the U.S. economy seems headed for a rebound, the threat of an increase in the “hassle factor” is no doubt slowing the return of business travel to the levels enjoyed in the late 1990s and the restoration of a solid economy.

While we recognize the need to fortify our aviation security system, no one would wish to give up all the benefits—openness and efficiency—of our modern international travel system. In fact, the prosperity that the market economies of the world enjoyed in the 1990s was dependent on open and efficient travel facilitation systems.

NBTA is very concerned that the recent changes to enhance the security of our passenger prescreening systems could damage open and efficient travel facilitation and slow our economic recovery. NBTA observes with concern the recent developments in travel regulations. We welcome all sincere efforts to establish better security measures but also see the need to implement policies, programs and practices which are in accordance with protection of civil liberties and do not burden business travelers and their companies with unnecessary costs.

Prior to September 11th, 2001, the system was challenged, but it sustained itself. Through the cooperation of the public and private sector, we have come through the worst difficulties. In the process, the U.S. economy is starting to rebound, and the international system has made itself stronger, more flexible, and more enduring.

In order to continue the process of economic recovery, NBTA urges for satisfactory solutions to the major questions concerning Secure Flight. We recommend that:

- **The U.S. Department of Homeland Security (DHS) address how Secure Flight will deal with the operational and privacy issues identified by the U.S. Congress for the CAPPS II program**
  - **Determine and verify the accuracy of the database to be used by Secure Flight**

While the high profile cases of mistaken identity involving Yusuf Islam, Senator Ted Kennedy, and Representative Don Young might provide amusing headlines, the hundreds of cases of mistaken identity involving

less famous business travelers are just as serious. A recent survey conducted by NBTA found that over one-fourth of our member companies have over 5,000 business travelers a year. The frequency of business travel offers many chances for a case of mistaken identity and the disruptions that come with it.

- **Develop and document a process under which passengers impacted by the program can appeal decisions and correct erroneous data**

When dealing with such cases of mistaken identity, there must be a clear process for an immediate redress procedures that can take place at the airport. If a frequent traveler gets on the list in error, it's possible that he/she would not be able to travel easily for weeks or months which could be a hardship to a company. The redress needs to be immediate. NBTA would like to see corporate travel be treated separate from leisure travel and have a temporary pass to continue to fly while the security investigation is cleared.

- **Stress-test and demonstrate the accuracy and effectiveness of all search tools**

NBTA wants to ensure Secure Flight can handle the passenger volume that a healthy economy will no doubt bring. According to the Department of Transportation forecasts, there will be one billion passengers coming through the system by 2012. The DHS must make sure that in the rush to accommodate security concerns the agency does not forget to prepare for travel today and tomorrow.

- **Develop sufficient operational safeguards to reduce the opportunities for abuse and establish substantial security measures to protect the program from unauthorized access by hackers and other injuries**

NBTA believes there should be an airline industry standard for data storage, usage, and protection. We suggest the following standards should be adopted for the data storage: Restricted use, confidentiality, data masking and transfer of the data. Also Safe Harbor provisions should be introduced due to the international sectors of the industry. An additional concern is how long this data will be stored. We feel there needs to be a timeframe for retaining the data, such as 12 months and then the data expires in the data base.

- **Adopt policies to establish effective oversight of the use and operation of the system**

NBTA strongly believes that travel security is national security and has long supported the creation of a position within DHS to help improve communications between the travel industry and the DHS. NBTA believes such a position can inform DHS agencies on the effects of their policies and regulations on the travel industry. More importantly, this position will liaise with travel industry professionals; providing a format for the DHS to receive new ideas to solve many of the challenges facing the Department. With a transparent test process and a public-private partnership, NBTA believes Secure Flight can develop into a useful tool to ensure DHS can focus their resources effectively while providing a hassle-free travel process.

- **Identify and address all privacy concerns**

NBTA understands that ultimately Secure Flight will allow the U.S. government to focus more on the real threats and less on the millions of frequent travelers who are going about the nation's business. However, NBTA believes that there is a need for a clear and stable regulatory framework to guarantee free movement of personal and corporate data while maintaining privacy, confidentiality and security. More importantly, this framework will help to ensure consumer and corporate confidence in the exchange of information through the security screening process.

NBTA has also included the results of an NBTA membership survey taken earlier this year on the CAPPS II program. While we understand there are several differences between the Secure Flight and CAPPS II programs, we believe this poll still provides valuable insight into the privacy concerns of today's business travel buyer.

We urge the Department of Homeland Security to help speed economic recovery and to protect all Americans, through the development of efficient and cost-effective security procedures. NBTA's voice will not fade away until we have reached a safe, efficient and cost-effective transportation system.

# Survey: CAPPS II Feedback

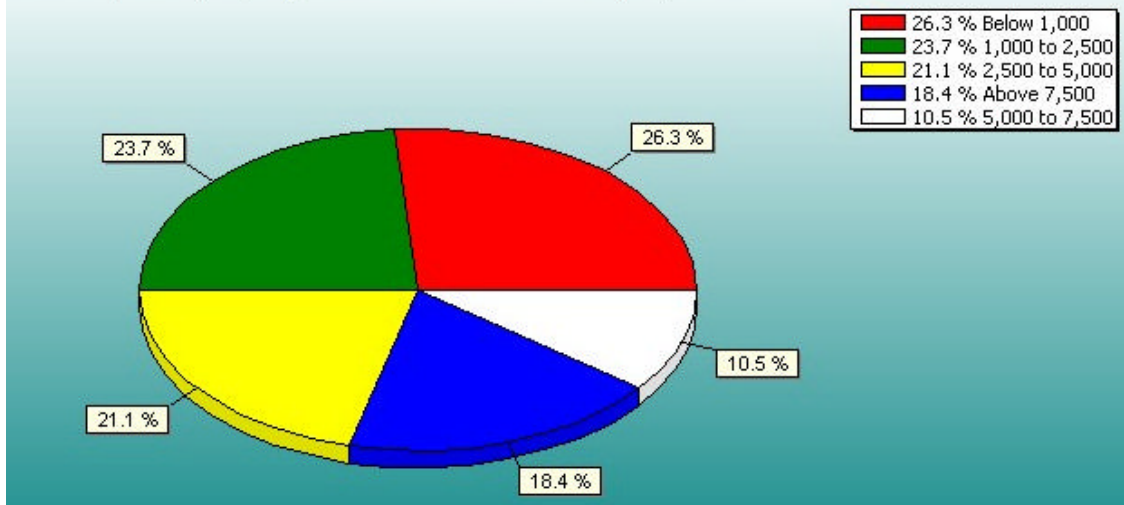
CONNECTING THE BUSINESS TRAVEL WORLD



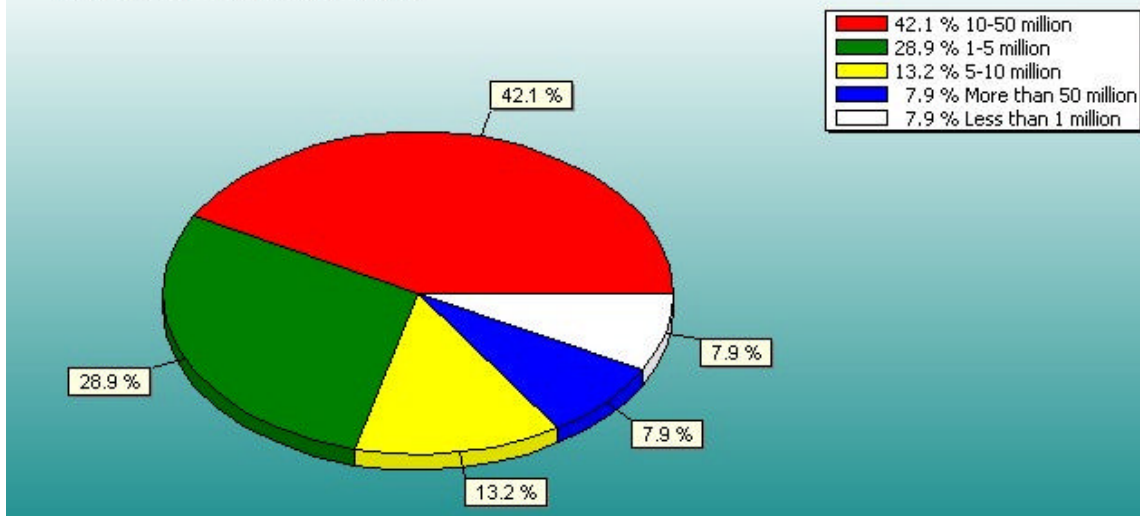
NATIONAL BUSINESS TRAVEL ASSOCIATION

Author: NBTA

What is your company's approximate number of travelers per year?



What is your annual air expenditure?



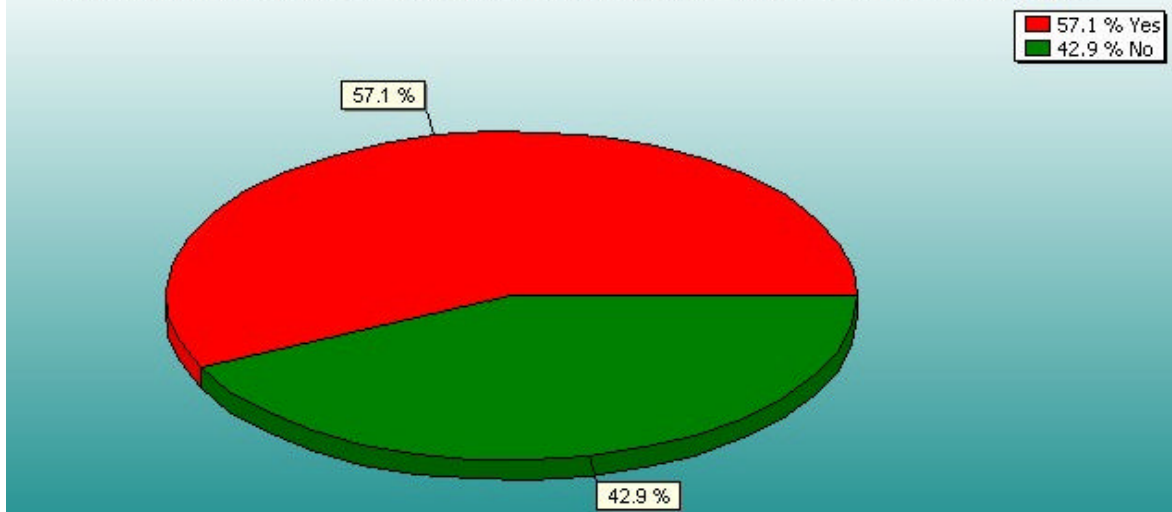
### How does your travel department update traveler profiles?

Response	Percent
Partially automated from an internal source, traveler provides personal preferences	48.7%
Manually: Traveler fills out paper profile or e-mail and returns to travel department for entry	30.8%
Other	20.5%

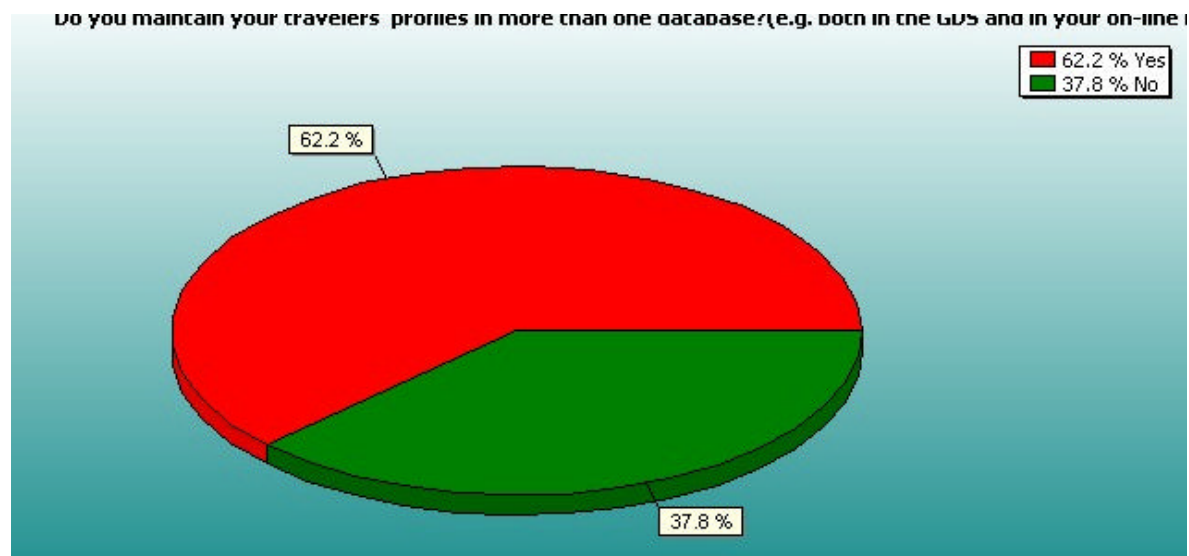
"Other" responses:

employee fills out/updates profile on-line
Online Booking tool is automated - traditional office is manual
Thru our online booking system
Traveler and or Admin keep profile update in Get There no paper involved
Paper or email for travel office and traveler manually enters directly into CTO booking tool
Travel Agency
Profiles are managed by the individual Traveler through CWT's Portrait data base.
Travel Agency has online profile program; traveler is responsible for updating their information

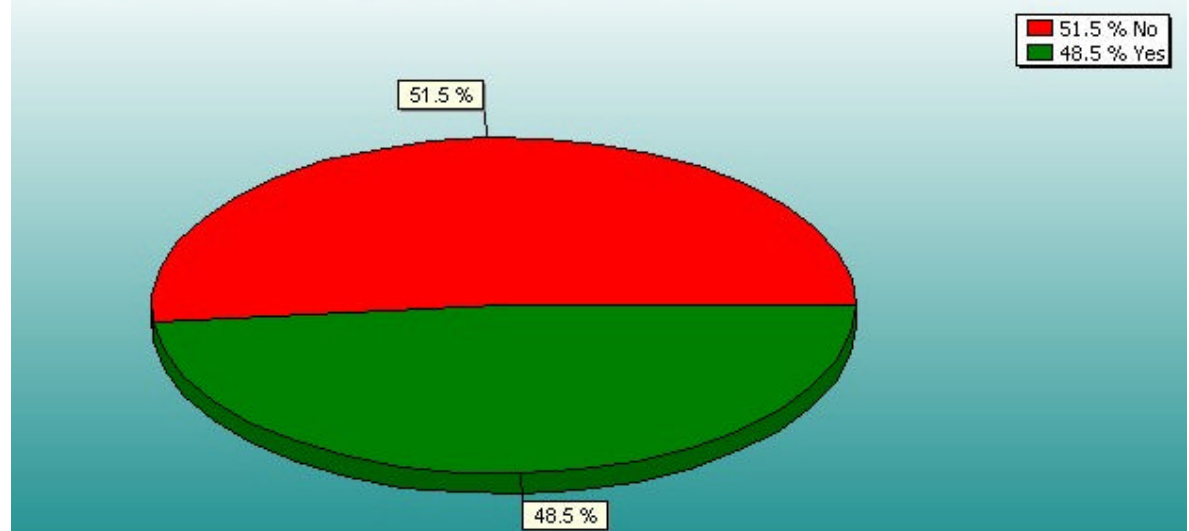
**If you use an automated system, does it interface with a profile management/synchronization tool?**

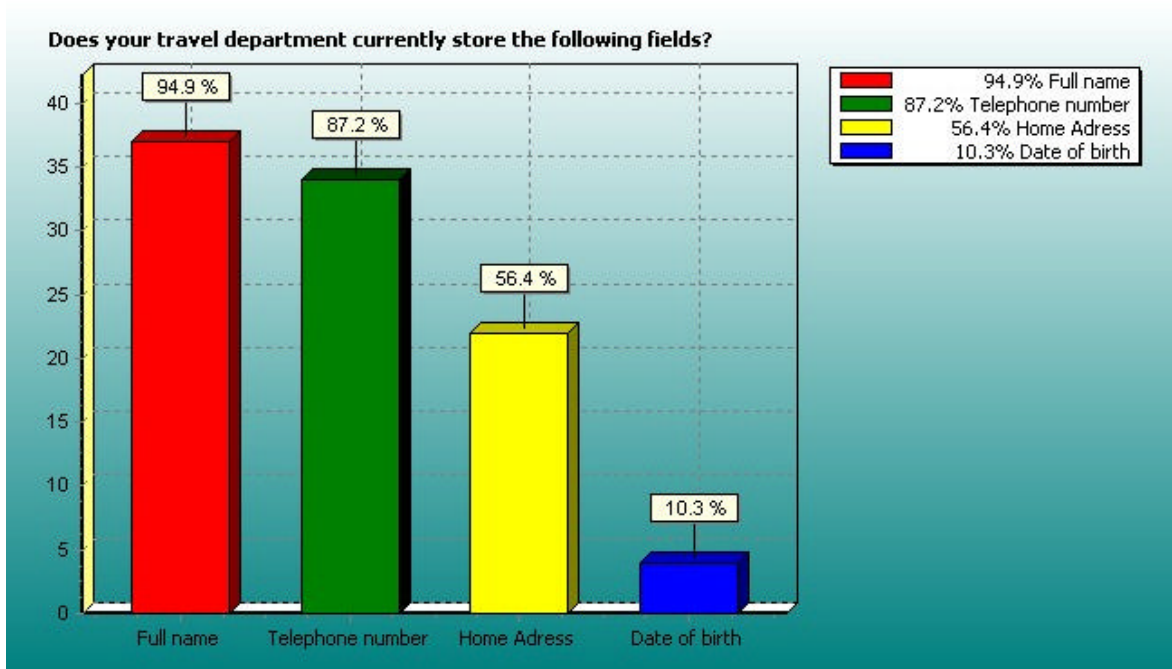


Do you maintain your travelers' profiles in more than one database?(e.g. both in the GDS and in your on-line booking tool)?

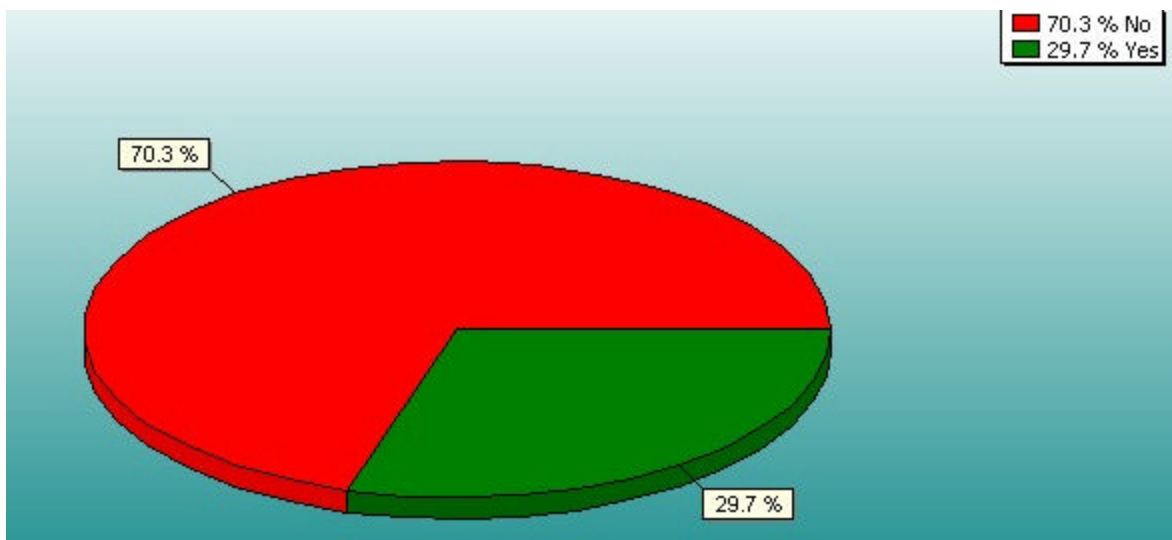


If you have multiple profile databases, do you synchronize them?





**Are you confident that you can maintain accurate profiles in multiple systems with the information that CAPPS II requires?**



"Comment" responses:

Not required as we have only one data base

I'm not confident that travelers will be willing to release this information.

I don't think Corporations and or travel mangagment companies are ready for this.



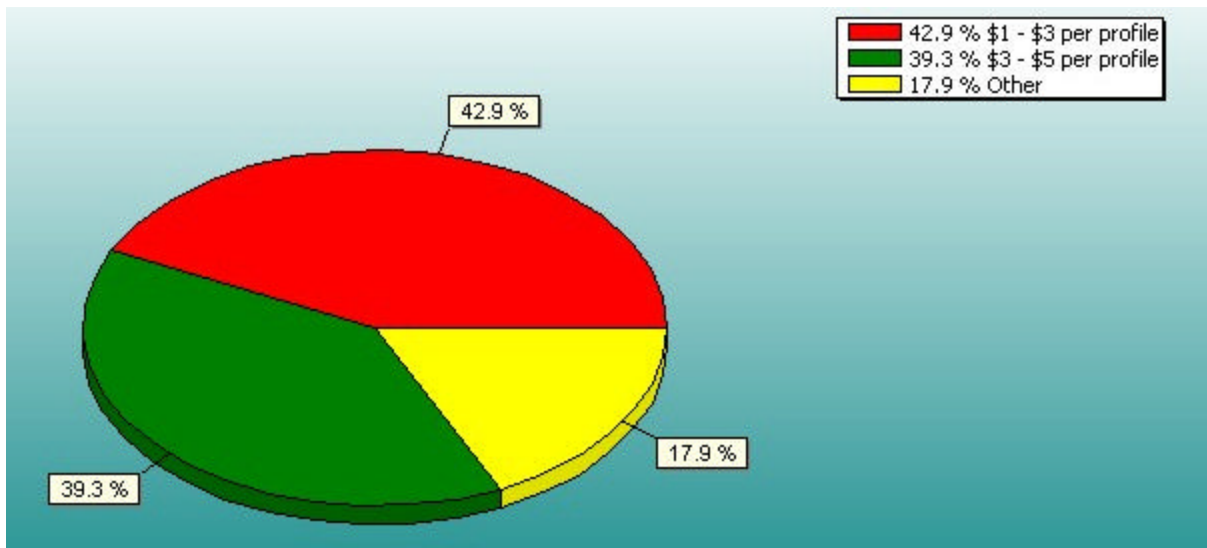
Will be time consuming
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Once we move to synchronized profile system later this year, we will feel more confident
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On-line tool updated by travelers, GDS by agency
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We currently do not capture date of birth, globally
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**If your travel department updates traveler profiles manually, how much more will it cost to update profiles with CAPPSII's required items (labor cost)?**



"Other" responses:

labor intensive to update both systems , match and reconcile them will take up lots of labor
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I have no idea how much more it will cost
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Nothing
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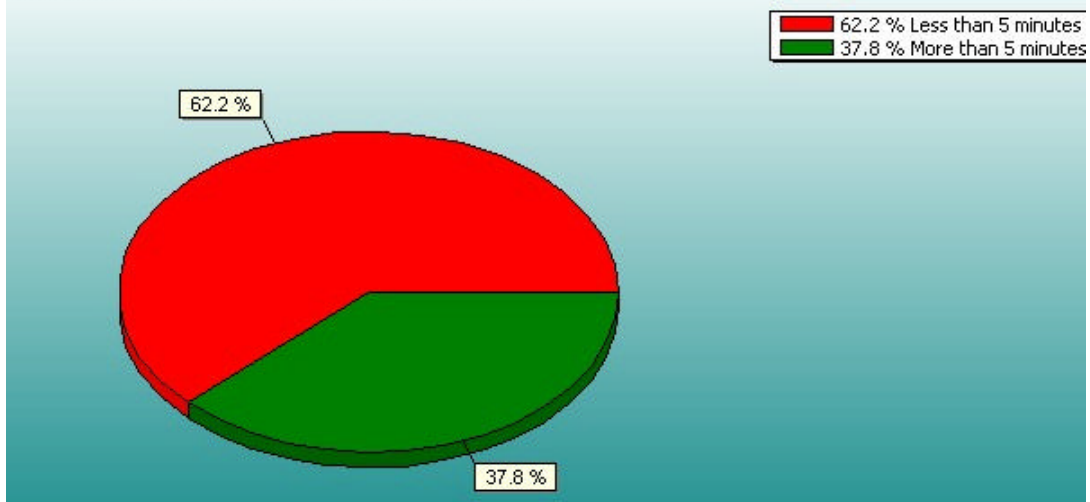
Unknown
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n/a
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I do not know
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As process is partially automated, would have unknown programming costs
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What is your travel department's average call time?



"Comment" responses:

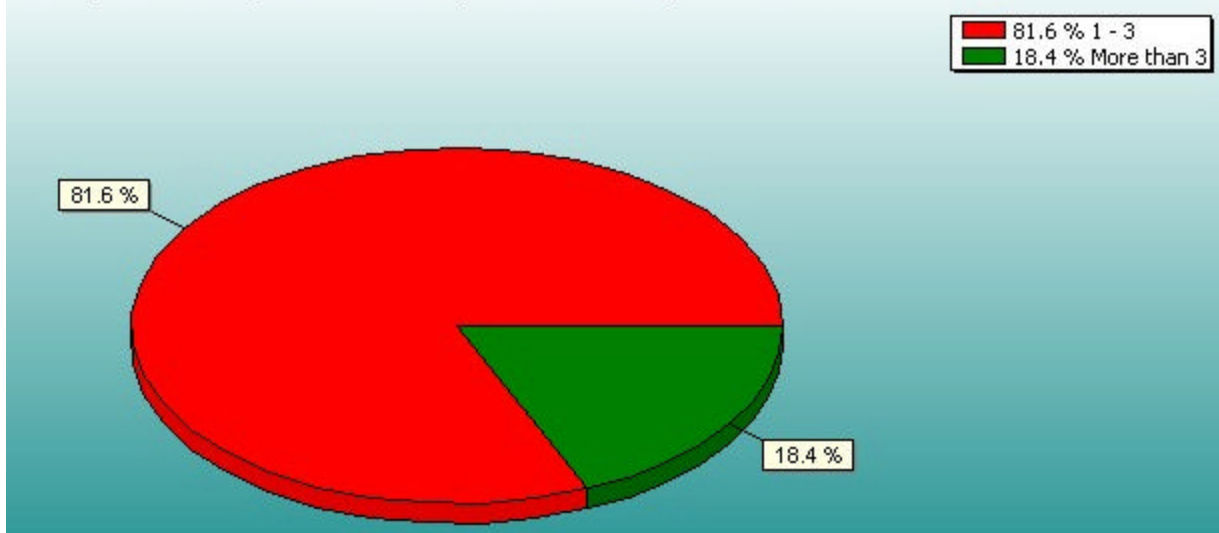
right at 5 minutes

Traditional Office handles mainly international flights - domestic are mandated to online tool

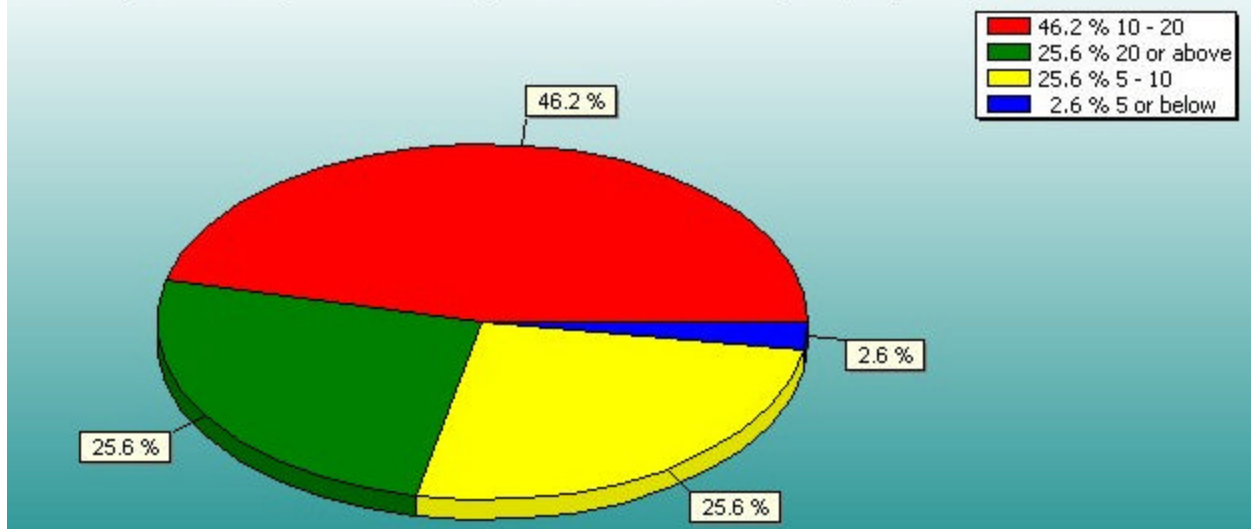
Not applicable don't have ACD equipment

96% usage of an online tool

What is your travel department's average number of calls per reservation?



**What is your travel department's average number of transactions per agent per day?**



**Are there any additional costs connected to CAPPSII that concern you?**

The cost of transmitting the information to TAS...and the initial cost of the set-up from the travel management company.
Not on front end. Privacy issues and denied boarding/appeals process.
Manual entries require time and cost but do not ensure accuracy. Then What? Travelers enrol in a multitude of loyalty programs under names that are not an exact match to their payroll name. Their payroll name may not be an exact match on their drivers license. What is going to be the standard for matching names and what happens when nothing matches?
The problem would be bookings for groups that can be done individually in one PNR or group booking
Not cost so much as efficient. Why aren;t they just looking at social security number?
Not sure how to maintain when traveller move to new address or new phone number. They will not remember to tell us because we use email for itinerary. Not need to check home address / phone.
I need to know more about the costs as I'm sure there are hidden costs which have not been explained to us.
Just all of the unknowns and the fact that this is not being communicated directly to corporations that will be impacted.
Productivity costs association with insuring home phone numbers are accurate. No guarantee that our HR file is up-to-date or kept up-to-date with this info.
No
I do not know

Lost productivity when things don't go according to plan.
concerned about additional computer security software or fire walls.
Costs associated with redevelopment of Profile site